



**DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
1000 NAVY PENTAGON
WASHINGTON, D.C. 20350-1000**

AGC(E) 03132
December 3, 2003

MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES

Subj: 104th CARABAO WALLOW

The Military Order of the Carabao will conduct its 104th Annual Dinner ("Wallow") on January 31, 2004, at the Omni Shoreham in Washington, D.C. Representatives from the military departments, as well as from Congress, foreign governments, and defense contractors will attend.

The Department of the Navy has determined that attendance by Department of the Navy personnel at this event constitutes an exception under 5 C.F.R. 2635.204(g)(2). This memorandum constitutes a finding pursuant to 5 C.F.R. 2635.204(g)(3)(ii) of agency interest in the "Wallow". Accordingly, Department of the Navy personnel whose duties do not substantially affect the Military Order of the Carabao may accept free attendance at this event and the provision of food, refreshments and entertainment furnished to all attendees as an integral part of the event. They may not, however, accept travel expenses or lodgings personally.

Department of the Navy employees whose duties may substantially affect the Military Order of the Carabao should seek an individual determination pursuant to 5 C.F.R. 2635.204(g)(3)(i) regarding this event from their local ethics counselor.

A handwritten signature in black ink, reading "David W. LaCroix", is positioned above the printed name.

David W. LaCroix
Assistant General Counsel (Ethics)